

Before the
Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

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Truth-in-Billing

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And

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Billing Format

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CC Docket No. 98-170

)

COMMENTS OF AMERITECH

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I. INTRODUCTION AND SUMMARY.

Ameritech agrees that telephone bills should be “user-friendly” so customers can “understand the services being provided and the charges assessed therefore, and to identify the entities providing those services.”¹ For these reasons, Ameritech fully supports development of “truth-in-billing” guidelines that improve ease of use and customer understanding of telephone bills. However, new federal billing regulations are neither necessary nor appropriate to achieve these results. Rather, the industry can implement them itself.

So long as a carrier accurately and clearly bills for services actually ordered by the customer, the Commission should neither restrain, nor regulate that carrier’s billings to its customers. Ameritech believes that most carriers understand that clear, concise and accurate bills are a competitive necessity, and are developing them on their own.² To the extent a few carriers insist on issuing untruthful or misleading bills, enforcement is the appropriate remedy.

¹ NPRM para. 1.

However, in order to protect the public from a few unscrupulous carriers, the Commission need not stifle the incentive and ability of the majority of honest carriers who are striving to develop customer responsive billings.

In fact, Ameritech is on the verge of converting to a new wireline residential bill format that it believes will be a positive competitive differentiator for its services. To assure that its new bill format is responsive to its customer's desires, Ameritech used focus groups of residential users to determine their expectations and needs. In addition to this "front-end" customer research, Ameritech "tested" its new format with more focus groups. As a result of these efforts, 92% of residential customers surveyed found the new bill format easy to understand, and 73% rated it as extremely or very easy to find important information. Ameritech is now in the final stages of implementation and expects to begin to use the new bill format in the near future.

In the course of its consumer research, Ameritech discovered that what customers want most of all is a bill that is concise, understandable and accurate. Unless the bill meets these objectives, the bill will not be an effective vehicle for reducing slamming, cramming, or fraud. Ameritech proposes that the Commission adopt these fundamental objectives of conciseness, understandability and accuracy, and measure each proposal against them. Accordingly, the Commission should not adopt guidelines that will have the effect of lengthening bills or making them more complex. This is of particular concern, since several of the proposals in the NPRM would have that effect.

The Commission correctly recognizes that "disclosure of every detail may add unnecessary information to a consumer's bill without doing much to enlighten that consumer."

² The Commission need not look further than the experience of the automobile industry with the implementation of safety regulations which, when they became a competitive issue, were implemented far in advance of governmentally mandated deadlines and went well beyond those mandates.

The Commission asks carriers to address the extent to which they have "in place practices similar to, or that have the same effect as the proposals in this Notice." The Commission further asks for comment on less "burdensome practices that would achieve that same goals and 'truth-in-billing' guidelines." Ameritech agrees that the Commission should be mindful of the costs and burdens that will result from the adoption of any proposal, and carefully weigh them against its benefits. To this end, the Commission should not require modification of existing systems and practices that already meet the Commission's objectives. Ameritech will describe its billing format and practices in its Comments, and point out how they already meet the Commission's objectives.

Moreover, any outcome of this proceeding should recognize the wide range of system capabilities that are inherent in different billing systems, and should not impose rigid or overly detailed requirements that may needlessly impose hardships on certain carriers and their customers. Ameritech was only able to complete its new bill project within eighteen months with a manageable \$8 million budget because the project was intentionally limited to format changes that entailed no significant software or hardware changes to billing and underlying legacy systems. In particular, Ameritech was careful to ensure that its bill enhancements did not require rework of existing billing system logic, underlying legacy systems, or the addition of new hardware, as several of the proposals in the NPRM would require. Thus, the \$8 million cost of implementing Ameritech's new bill format pales when compared to the costs that would have to be incurred if the changes had required significant modifications to billing or legacy systems.

In the following sections, Ameritech responds to questions raised by the NPRM. Ameritech's Comments are based upon the results of its consumer research, the capabilities of its systems, and the content and format of its bills. However, Ameritech is not suggesting that the

Commission foist Ameritech's solutions on the rest of the industry. Rather, they are presented as one carrier's method of achieving the Commission's objectives of understandable bills without incurring unreasonable costs or delays.

II. THE COMMISSION HAS NO AUTHORITY TO ISSUE REGULATIONS REGARDING LOCAL AND INTRASTATE TELEPHONE BILLS.

Ameritech does not believe the Commission has jurisdiction to issue billing regulations for local and intrastate telephone service beyond those relating to pay-per-call service. The fact that Section 228 of the Telecommunications Act of 1996 provides statutory authority for the Commission to regulate billing of a specific service -- pay-per-call services -- does not in and of itself authorize it to usurp jurisdiction over billing of all other local and interstate services. In fact, it demonstrates the opposite -- the Commission lacks statutory authority to regulate billing of other local and intrastate services, except where that authority is explicitly granted. If the Commission had general statutory authority to regulate billing of local services, Congress would not have enacted Section 228. Therefore, where Congress intends to convey jurisdiction to the Commission regarding local telephone bills, it specifically provides for it. Ameritech, thus, shares Commissioner Furchgott-Roth's "deep reservations" regarding the lack of statutory authority for the Commission "to regulate" billing content or format.

Nonetheless, even if the Commission has the statutory authority to regulate local telephone bill format, it should not do so to the extent states already have adopted statutes, regulations or guidelines governing local billing. For instance, Illinois recently enacted a law requiring carriers to notify customers of changes in their carriers or service within ten days by

mail or requiring third-party verification.³ Ameritech notes that many state commissions, including those that regulate Ameritech, are also active in this area.⁴ In fact, some of the state commissions in the Ameritech region have open proceedings or rules on billing.⁵ For this reason, Ameritech agrees that the Commission's efforts should "complement" those of the states and other agencies. If customers are to receive clear and concise bills, it is important that carriers not be subjected to conflicting and overlapping regulations.

III. AMERITECH SUPPORTS THE COMMISSION'S PROPOSAL TO DEVELOP USEFUL "GUIDELINES".

Ameritech agrees that the three guidelines proposed in the NPRM will improve consumer understanding of telephone bills. First, bills should be organized to present important information clearly and concisely. Second, bills should be clear and not misleading. Third, bills should contain information that enables customers to make inquiries about their bills to the appropriate provider. As long as a carrier's billings meet these objectives, the Commission should not impose additional requirements micromanaging how those objectives are met. Rather, it should allow carriers to develop billing formats and practices that implement the Commission's principles.

³ 220 ILCS Section 13-902.

⁴ For example, The Public Utilities Commission of Ohio ("PUCO") recently adopted its Rule 4901: 1-5-16 governing billing for local and toll services. The rules require the listing of contact numbers, separate itemization and identification of charges by type. See, also, 83 Illinois Administrative Code, Part 735, and in particular Section 735.70 which governs the timing and itemization of charges on bills.

⁵ See, Indiana Utilities Regulatory Commission, IURC Cause 41189. The Illinois Commerce Commission has also commenced a Billing Rulemaking Workshop that will examine most of the issues raised by the Commission in the NPRM.

A. The Guidelines Should Apply To Residential Wireline Bills.

Although the Commission does not specifically address the issue, Ameritech believes that based on the content of the NPRM, this proceeding is and should be focused on residential wireline billings. Business and carrier-to-carrier billings often involve bills that are highly specialized to meet the demands of sophisticated users, and involve different circumstances and needs than residential bills. Moreover, in many cases, business and carrier-to-carrier bills are provided in special and electronic formats to enable the business to more readily review and audit them through electronic and other means. Under these circumstances, imposition of mandatory bill format requirements on business and carrier-to-carrier might actually inhibit the ability of carriers to respond to the needs of their business and carrier customers.

For these reasons, businesses are normally excluded from the type of consumer protection rules being considered by the Commission. For example, the Commission suggests that the Truth-in-Lending Installment Billing Rules may be pertinent to this proceeding.⁶ However, these Rules apply primarily to residential charges “primarily for personal, family or household purposes.” In fact, these Rules do not apply to an “extension of credit for business, commercial or agricultural purpose.”⁷

The Commission should also clarify that any billing rules will not apply to CMRS providers. The problems of slamming and cramming which have plagued the interexchange landline business have simply not materialized in the CMRS segment.

⁶ NPRM at ¶8.

⁷ 12 CFR 226.3(a). Certain limited requirements (e.g., unsolicited credit cards, \$50.00 maximum liability, etc.) apply even if the credit card is used for business purposes, but do not pertain to disclosure requirements.

B. Organization Of The Bill.

1. Bill Summaries Should Concisely Summarize The Bill.

In paragraph 18 of the NPRM, the Commission proposes that carriers provide a separate bill page or section summarizing the current status of the customer's service. The Commission proposes a list of different types of data that might be included in that summary. Ameritech agrees that bill summaries are an important tool that can facilitate customer understanding and convenience. For this reason, Ameritech will include summary sections on the first page of its new residential wireline bill.

However, in order to be helpful, a bill summary must be just that -- a concise summary of data important for understanding and reviewing the bill. The summary should not, however, also summarize all aspects of the customer's underlying service, nor describe in detail all services provided to the customer. To endeavor to do so will create summaries that are not concise enough to be of value to consumers.

Ameritech believes that it is important to take a step back and explore how customers use a bill summary. Ameritech has discovered that consumers use bill summaries as a quick and convenient method of determining if their bill is within the range of the customer's expectations, or whether he or she needs to inquire more deeply into the bill. Therefore, rather than focus on the status of the service, bill summaries should clearly and concisely summarize the contents of the customer's bills sufficiently to enable him or her to determine if the bill appears to be correct.

Consistent with the above principles, Ameritech will provide an up-front "Bill-At-A-Glance" section on the first page of its new wireline residential bills, which lists the previous amount billed, payments received, credit adjustments, current charges, past due amounts, net payment due, and due date. The first page of the bill will also segregate Ameritech's local

service charges from the other charges on the bill and list them by clearly defined plainly marked (e.g., bold face type) and discrete section.

The summary page will further contain a "Billing Summary" which will itemize by provider or aggregator the aggregate charges billed on behalf of each entity, and its customer contact number. The Billing Summary will also provide the cumulative total of current charges. In cases where an entity in the Bill Summary is not the underlying service provider (for instance, in the case of an aggregator) the underlying service provider's name is listed in the detail section of the bill. Thus, if the customer is unfamiliar with the bill aggregator, or the amount listed is not in line with the customers' expectations, he or she can verify the identity of the service provider or validate the amount billed in the bill detail pages of the bill.

The first page of the bill also will contain a "News You Can Use -- Summary" which provides news that may impact the customer. For instance, the section will disclose if there has been a change in the customer's presubscribed interexchange carrier ("PIC") during the previous month. The section also lists Ameritech's repair service number, and the Telecommunications Relay System number.

If a bill summary is clear, concise, and understandable to customers, there is no reason for the imposition of onerous additional special requirements of the type proposed in the NPRM. In fact, such requirements may be counterproductive by creating a bill summary that is more complex or expensive to generate than is necessary. For example, as previously described, 73% of Ameritech consumers surveyed, stated that the new bill format will make it extremely or very easy to find important information. In fact, it will lend itself to very easy side by side comparisons with prior bills, so that changes in a customer's service will be obvious and

detectable. Thus, providing further data in the summary will make it, on balance, more complex, without providing new data end users need to understand and validate their bills.

2. Ameritech's Bills Will Advise Customers Of Changes In Their PIC.

The Commission asks in paragraph 19 of the NPRM if inclusion of a summary of changes to a customer's account could help to defend against "cramming, slamming, and other types of fraud." In particular, the Commission asks parties to address providing a summary of 1) changes in PICs, 2) new service providers, 3) changes in PIC protection status, and 4) explanations of any new line item charges. Ameritech addresses the issue of highlighting new charges in the next section. Ameritech believes that clearly advising customers of changes in their PIC choices may not prevent slamming in the first instance, but will help customers detect when they have been slammed.

As previously noted, Ameritech's new bill format will highlight changes in a customer's PIC through the display "Long Distance Change" in the summary section dubbed "News You Can Use". This display will alert customers of the need to check the detail section of the bill to identity their new PIC. In most cases, the name of the new PIC will also be listed in the Bill Summary. Between the News You Can Use, the Bill Summary and the bill detail pages it will be readily apparent to even the most casual of observers that there has been a PIC change, without the imposition of an additional, expensive and redundant listing of the new PIC's name separately in the summary.

If the customer's PIC has changed (or been slammed) to a so-called switchless reseller, and the switchless reseller uses the facilities of the customer's existing carrier, there will be no change in the customer's carrier identification code ("CIC") and Ameritech's systems are unaware of the change. As far as Ameritech's network and databases are concerned, the

customer's interexchange carrier will not appear to have changed, and Ameritech will be unable to inform the customer of the PIC change in its bill.⁸ Thus, if the Commission wishes to ensure that customers are notified of changes in their PIC where a switchless reseller is involved, it must place appropriate requirements directly on the switchless resellers and facilities-based interexchange carriers.

While the existence of PIC Protection on an account is certainly an effective tool in defending against slamming, providing the PIC Protection status of an account on a bill will add little value. Either an account is "protected" and immune from certain types of slamming, or it is not. Providing the customer every month with a reminder of its selection will add no additional level of protection against slamming, but it will certainly further complicate the bill.

3. Carriers Should Verify New Charges, But Bills Are Not The Only Method of Providing That Notice.

In paragraph 10 of the NPRM, the Commission proposes that "bills should be clearly organized and highlight any new charges or changes to consumers' service." The Commission notes that "one way to accomplish this objective may be to require that a telephone bill contain a summary of any changes in the status of a consumer's services, as well as a summary of the current status of a consumer's services." Paragraph 19 of the NPRM also discusses notification to customers of changes to their service and new charges on their bills.

Ameritech agrees that a carrier should verify the addition of new services or features to a customer's account. However, Ameritech does not believe that bills are the only effective method of providing that notification. For instance, Ameritech sends its wireline residential

⁸ The switchless reseller, when it signs up the customer (or slams him or her), informs the underlying facilities-based carrier whose service it is reselling, and the underlying carrier then channels the usage data for the customer to the reseller for billing. The switchless reseller will then appear on the customer's next bill (usually as a billing aggregator), but Ameritech has no systematic way to identify this fact or place it on the bill.

customers a separate confirming letter each time they order a new local exchange service or feature, in lieu of highlighting the change on the bill. Recently, Illinois imposed this same requirement by statute, but significantly authorizes notification by mail, not in the bill.⁹

Ameritech has discovered that this procedure is a very effective method of verifying customer orders, while not requiring an expensive modification to its existing systems. Under these circumstances, it is redundant and wasteful to provide a second notification of a service change on the face of the bill.

Ameritech's wireline billing systems currently do not have the capability to recognize changes in a customer's services and features from month-to-month. Ameritech has redesigned its bill at great expense -- by the time the first bill is issued Ameritech expects to have spent \$10 million dollars. Yet, in order to control costs, Ameritech was careful to ensure that the new bill involved only reformatting of existing billing information from existing billing feeds. While the bill will change dramatically and for the better, the behind-the-scenes systems remain the same.

However, something that appears so simple as bolding or italicizing changes for new services or features on the bill is not supported by the existing billing and legacy systems and, thus, has vast and far reaching implications on Ameritech's systems. New system databases and logic would need to be created to identify and flag the changes from one month's bill to the next, so they can be highlighted on the bill. Yet, even following this procedure, if the service is usage-based, Ameritech cannot determine whether it is actually "new" or the customer did not use the service during the prior bill period. Moreover, in order to perform this bill comparison, billing processing time and complexity and time would be increased manyfold, which would entail extensive and expensive hardware and additional storage capacity and memory. Moreover, the

⁹ Id. ft nt. 3.

need to identify new changes would impact Ameritech's Customer Information System ("ACIS"), which is a legacy system used by the billing system to generate residential billing. Ameritech has five different versions of ACIS that its billing system interfaces with, one for each state's tariffs and offerings. All five of these systems would have to be significantly altered, augmented and upgraded to accommodate this proposal.

This is a change of such dimension that Ameritech cannot, at this time, precisely estimate its costs, although, it can state that it would be a massive undertaking that would be prohibitively expensive. Moreover, such an undertaking of this magnitude might also preempt Ameritech's ability to implement other important billing enhancements.

In addition, Ameritech is also unable to identify on its bill summary new services that the customer may have ordered from third parties that bill through Ameritech. When a customer orders a new service from a non-Ameritech provider, such as voice mail or an information service, Ameritech is not aware that the service is new because the other provider does not provide that information as a part of its billing feed to Ameritech. It is also unable to verify the accuracy or validity of the billing. Even if that data were provided, there is currently no capability in Ameritech's systems to identify the change on the bill. Developing such a link would also be enormously costly for the reasons just discussed.

In addressing the issue of identification of changes on a bill, the Commission should also consider the timing of such changes. That is, carriers cannot always identify such changes in the first bill sent to a customer after the change occurs. For instance, if a customer makes a change in his or her PIC, the change customarily is implemented by Ameritech's network within 24 hours, but if the customer's latest bill is already in the process of being printed and mailed, the change in the PIC cannot be reflected in that bill. In such cases, the change cannot be identified

on the bill until the second bill after the change. Therefore, any Rules issued by the Commission in connection with the identification of changes on the customer's bills should take account the fact that such identification cannot always be shown on the first bill after the change.

4. Ameritech Organizes Its Billings By Entity.

In paragraph 17 of the NPRM, the Commission asks if bills should be organized by service or provider. Ameritech believes that bills can be effectively organized by service provider, aggregator, or other billing entity, although visual separation between service categories of the same provider or aggregator can help customers understand their bills.

Ameritech will organize its new bill by billing entity (such as a interexchange carrier or a sub-CIC) with each such billing entity having its own separate page. The separate detail pages for the different billing entities will have that company's logo and contact numbers on them. Interexchange carrier "miscellaneous" charges will be displayed in the "Miscellaneous Charges and Credits" portion of that carriers respective page. These miscellaneous charges can be supported by an up to thirty-character description. Charges for information service providers will be handled in a similar fashion.

Ameritech also intends to organize its new wireline residential bills so that different categories of services are visually separate. For instance, local charges will be differentiated by the use of a "reverse video heading" (e.g., white letters against a black background) followed by the detail of the charges relating to that category.

C. Service Descriptions.

1. Services Should Be Concisely Identified.

In paragraph 10 of the NPRM, the Commission proposes that bills have “full and non-misleading descriptions of all charges that appear therein and clear identification of the service provider involved.” The Commission asks the parties to address “options for ensuring that bills contain clear and accurate descriptions of the specific charges that are being billed, including charges recently imposed by some carriers to support universal service contributions.”

Ameritech agrees that where a customer desires it, bills should identify each charge so the customer knows to which service it relates. However, in order to keep bills clear and concise, these service descriptions should be brief and only provide the information necessary for the customer to identify the service involved.

To achieve the goal of keeping bills concise while providing essential information, Ameritech uses character limitations (maximum number of letters in the description).¹⁰ To further reduce any confusion and aid consumers in identifying services, Ameritech is ensuring that the service descriptions it displays on its bills are the same as the ones used by its service representatives. For example, service representatives refer to intraLATA toll as “local toll” so the bill will now likewise use that terminology.

Regarding service descriptions provided by interexchange carriers and others, including those relating to universal service charges, incumbent LECs are not in a position to police their accuracy, since they are not the service provider. Beyond ensuring that descriptions are specific,

¹⁰ The length of these fields is defined within the tables and programs written to support the bill display. The system limits these fields to a 72 character line of detail. These character limits are consistent with space allocation made within the bill format. Thus, changing these character limits would require extensive modification of the bill system logic and tables, as well as redesign of the bill to reallocate space as required to support the new character limits.

relate to the service involved, and meet certain format constraints (such as character limits) the incumbent LECs must rely on the wording provided to them.

2. Bills Should Not Differentiate Between Deniable And Non-Deniable Charges.

In paragraph 24 of the NPRM, the Commission asks if it should require that bills differentiate between charges for which local exchange or long distance service can be terminated ("deniable") and those for which they cannot be terminated ("non-deniable"). Ameritech agrees that customers that owe past due amounts should know how much they must pay to retain their local or long distance service. Equally as important, customers should be able to dispute any charge that they did not authorize, whether or not it is deniable. Ameritech provides this information through a separate mailing. Ameritech's delinquency notices advise customers of the amount they must pay to avoid termination of local service, which does not include any amounts for a non-deniable service. In addition, delinquency notices include an explanation of the process to dispute charges or to request a payment arrangement to avoid disconnection. Further, Ameritech's service representatives have knowledge of this information. Thus, there is little danger that customers will pay a disputed non-deniable charge out of fear that otherwise they will lose their local or long distance service.

Moreover, sorting charges on a bill by deniable and non-deniable is not only unnecessary, but any minor benefit it would provide is more than offset by the cost, confusion and fraud that it will cause. For instance, oftentimes services and features are provided in packages, and it would be confusing if the services within these packages are billed or identified separately. Any such separate identification will also further complicate customer bills and, thereby, confuse honest customer that wish to pay for what they ordered. Such a categorization would also provide a

road map for unscrupulous customers that may wish to evade lawful charges for services they in fact did order. In fact, such designation could encourage such activity.

Moreover, the area of denial of local service is one that has been for many years regulated by the state commissions. For example, each of the states in which Ameritech provides local exchange service has extensive regulations designed to protect consumers. The Commission should not require that carriers categorize charges by deniable or non-deniable, but rather rely on the expertise of the state commissions to balance the conflicting interests in this area.

D. Bills Should Contain Customer Inquiry/Complaint Information.

In paragraph 10 of the NPRM, the Commission tentatively concludes that “a bill should contain clear and conspicuous disclosure of any information that the consumer may need to make inquiries about the charges on the bill.” The Commission seeks comments on “a proposal that telephone bills contain consumer inquiry and complaint information, including toll-free telephone for the receipt of questions and complaints.” Ameritech agrees that bills should contain the contact number for each billing entity. In fact, as previously described, Ameritech’s new bill format will have a separate page for each different billing entity, and the summary page will conspicuously disclose each billing entity’s identity and contact number.

Ameritech requires that each entity for whom it performs billing have a toll-free number for customer inquiries, but this number may not actually be answered by the provider itself. Rather, some providers use aggregators or other third parties for customer inquiries; but this arrangement should be acceptable as long as whomever handles a provider’s customer inquiries is authorized to act as the provider’s agent to resolve customer complaints and provide billing adjustments.

Paragraph 34 of the NPRM also raises the possibility of including each provider's address on the bill. Ameritech recognizes that each additional bit of information can be helpful to consumers, but it does not believe that on balance inclusion of this information is warranted. Ameritech's experience is that the vast majority of customer questions and complaints are handled through phone calls, rather than correspondence. Thus, inclusion of multiple addresses on a bill adds little value where a contact telephone number is provided, yet could add to the size of the bill. To the degree that consumers need to obtain the address of their provider, they normally request that information when talking to the provider's customer service personnel.

In paragraph 23 of the NPRM, the Commission asks about listing the names of underlying service providers in lieu of just the names of the billing aggregators or clearinghouses. Ameritech agrees that it is appropriate to identify each underlying service provider, and it currently does on each billing entity's bill pages, based upon the information available to Ameritech.

Although Ameritech agrees that identification of resellers is beneficial for customers, Ameritech's bill can identify only those switchless resellers for which Ameritech is actually providing billing services (either directly or through an aggregator); where it is unaware of the arrangement. Ameritech's network cannot record a customer's change to a switchless reseller, where the reseller is using the same CIC as the customer's existing facilities-based carrier. Therefore, if the reseller uses a vehicle other than Ameritech for its billing, Ameritech has no way of informing the customer of that fact.

IV. ANY BILLING CHANGE HAS NUMEROUS OPERATIONAL AND COMPETITIVE IMPLICATIONS, INCLUDING Y2K CONSIDERATIONS.

The Commission should not lose sight of the fact that this proceeding applies to bills issued by thousands of different entities using many different and diverse billing systems with widely differing capabilities. What might be an inherent capability of one system, may be virtually technically impossible or unduly expensive for another. Moreover, telecommunications billing systems are extremely massive and complex and, as a result, can be very rigid and expensive to modify. What may seem like a simple requirement, may in fact cost many millions of dollars to implement. For instance, as discussed, simply identifying new services on customer bills exceeds the capabilities of Ameritech's system and could require massive amounts of capital and labor to implement, as well as require significant new equipment and memory capacity.

As a consequence, the Commission's concern about the cost and burdens imposed by its proposals is well taken. In order to contain those costs, Ameritech proposes that billing guidelines fully consider their impact on local systems of each carrier, remain general in nature, and thereby leave sufficient latitude for implementation at the local level consistent with each billing system's capabilities.

It is also important to remember that billing service is a highly competitive business. For that reason, the Commission must ensure that any billing regulations apply on the same basis to all residential bills, regardless of the entity that renders them. The Commission should further recognize that when incumbent LECs perform billing for other carriers and providers, the incumbent LECs are dependent on data provided to them by those entities. Incumbent LECs are not in a position to validate the other carrier's data. Thus, to the extent that the Commission

addresses the accuracy and propriety of the billings performed by incumbent LECs for other entities, it should adopt guidelines that apply directly to those entities. The responsibility of the incumbent LECs should be focused on format issues and ensuring that consumers can determine which carrier or provider is responsible for the charges, and how to contact that entity.

Further complicating the issues in this proceeding is the fact that Year 2000 computer software issues apply to billing systems. As a result, Ameritech will focus on preventing these software problems in 1999. For that reason, Ameritech will generally impose a half-year moratorium on billing system changes for the latter half of 1999. It may also need to resolve in the first half of 2000, any residential problems that arise. Ameritech recommends that the Commission likewise not require implementation of any billing system changes that require software changes until the middle of 2000.

V. CONCLUSION.

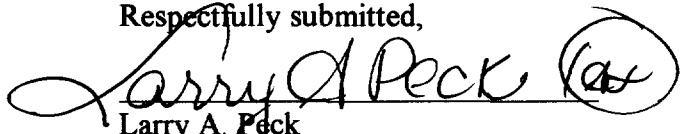
In summary, Ameritech proposes the adoption of general billing guidelines that allow sufficient latitude for carriers to implement them in local systems in the most efficient and cost-effective manner. In particular, Ameritech proposes the following general billing guidelines for consideration by the Commission:

Guidelines should apply to residential bills, but not to more highly specialized billings sent to business users, carrier-to-carrier billing, and CMRS billings.

1. Bills should, above all else, be concise, understandable and accurate.
2. Bills Summaries should summarize bill activity.
3. Carriers should verify changes in the status of a customer's account, but not necessarily through monthly bills.
4. Bills should identify each entity appearing in the bill.

5. Bills can be organized by provider or aggregator, with visual separation of service categories.
6. Bills should concisely identify each charge on the bill.
7. Customers should be advised of charges that they must pay to avoid local exchange or toll service discontinuance. However, bills should not categorize charges as deniable or non-deniable.
8. Bills should advise customers of the carrier responsible for each service and provide its customer service contact number.
9. No significant billing system changes should be implemented in 1999, or during the first portion of 2000.

Respectfully submitted,

A handwritten signature in cursive script, reading "Larry A. Peck", followed by a circled "X" or similar mark.

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